

MARC
ATTORNEYS AT LAW
A PROFESSIONAL CORPORATION
McCUSKER • ANSELM
ROSEN • CARVELLI
210 Park Avenue, Suite 301
Florham Park, New Jersey 07932
Tel: 973.635.6300 • Fax: 973.635.6363
www.marc-law.com

ANDREW E. ANSELM
Director
Direct: 973.457.0116
Fax: 973.457.0275
aanselmi@marc-law.com

October 8, 2013

FILED ELECTRONICALLY


Honorable Robert M. Levy, U.S.M.J.
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: DMJ Associates L.L.C. v. Carl A. Capasso, et al.
Civ. No. 97 CV 7285 (RJD)

Dear Magistrate Levy:

I write on behalf of Third-Party Plaintiffs Exxon Mobil Corporation and Quanta Resources Corporation pursuant to Your Honor's Individual Rule I(e) to request a modification to paragraph 14 of the Case Management Order in this matter (Doc. 1443). As discussed at the October 2, 2013 conference, Third-Party Plaintiffs request that the date for the updated production of Rule 26 Disclosures be extended from October 10, 2013 until November 25, 2013. Third-Party Plaintiffs seek this extension of time due to the complexity of internal document searches which appear to include both hard copy and electronic data. No prior requests to extend this deadline have been made. In light of the October 2 ruling on the record staying fact deposition discovery, Third-Party Defendants consent to this extension of time. The modification of this deadline does not affect any other dates set forth in the Case Management Order.

Very truly yours,


Andrew E. Anselmi

AEA/mws